

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 1:20-MJ-114
	)	
ZACKARY ELLIS SANDERS,	)	
	)	
<i>Defendant.</i>	)	
_____	)	

**MEMORANDUM ON DEFENDANT’S DETENTION**

The United States of America, by and through its attorneys, G. Zachary Terwilliger, United States Attorney for the Eastern District of Virginia, and William G. Clayman, Special Assistant United States Attorney (LT), hereby respectfully submits this memorandum in response to the Court’s Order dated April 23, 2020, ordering “that the government advise the Court and defense counsel by Monday, April 27, 2020 as to whether the defendant is still being held under [certain] conditions [at the Alexandria Detention Center described in the defendant’s April 13, 2020 filing] and if so, why.” Dkt. No. 25. In response to the Court’s Order, the government states as follows:

1. On or about April 16, 2020, undersigned counsel spoke to the defendant’s counsel, Jonathan S. Jeffress and Emily A. Voshell, by telephone. During the telephone call, defense counsel advised undersigned counsel that the defendant had been moved from the “intake” facility at the Alexandria Detention Center (“ADC”) and was being housed in “adseg,” or administrative segregation, at ADC.

2. On or about April 24, 2020, the United States Marshals Service for the Eastern District of Virginia advised undersigned counsel that the defendant was currently being housed in

ADC's general population and that the defendant had previously been housed in the "intake" facility while ADC personnel determined where to place him.

3. Also on or about April 24, 2020, undersigned counsel called the Alexandria Sheriff's Office—the organization responsible for the operation of ADC—and spoke to a deputy sheriff who confirmed that the defendant was being housed in ADC's general population.

Based on the above and in response to the Court's Order, the United States respectfully submits that the defendant is not presently being held at ADC in the conditions described in the defendant's April 13, 2020 filing.

Respectfully Submitted,

G. Zachary Terwilliger  
United States Attorney

By: /s/  
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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of April 2020, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

/s/

William G. Clayman  
Special Assistant United States Attorney (LT)